

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2023 AUG -9 PM 2:40

(Del. Rev. 5/2014) Pro Se Employment Discrimination Complaint

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Tonisha A Flowers

(Name of Plaintiff or Plaintiffs)

v.

Civ. Action No. 23 - 870
(To be assigned by Clerk's Office)

Rachael Griffith, Carolyn Wassur,

Department of Labor
(Name of Defendant or Defendants)

COMPLAINT FOR
EMPLOYMENT DISCRIMINATION
(Pro se)

Jury Demand?

☒ Yes☐ No

1. This action is brought pursuant to (check all spaces that apply):

- ☐ Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et seq.*, for employment discrimination on the basis of race, color, religion, sex, or national origin.
- ☐ Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et seq.*, for employment discrimination on the basis of age. My year of birth is: _____.
- ☐ Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, *et seq.*, for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance.
- ☐ Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et seq.*, for employment discrimination on the basis of disability.

2. Plaintiff resides at 904 Greystone Lane Apt. 1A

(Street Address)

Newark New Castle DE 19711
(City) (County) (State) (Zip Code)

(Area Code) (Phone Number) Attach additional sheets if more than one Plaintiff.

3. Defendant resides at, or its business is located at 4425 N Market St.

(Street Address)

Wilmington New Castle DE 19802
(City) (County) (State) (Zip Code)

Attach additional sheets if more than one Defendant.

4. The discriminatory conduct occurred in connection with plaintiff's employment at, or application to be employed at, defendant's _____ place of business
(Defendant's Name)
located at _____
(Street Address)

City) (County) (State) (Zip Code).

5. The alleged discriminatory acts occurred on _____,
(Day) (Month) (Year)

6. The alleged discriminatory practice ☐ is ☐ is not continuing.

7. On _____,
(Day) (Month) (Year), Plaintiff filed charges
with the Department of Labor of the State of Delaware: _____
(Agency)

(Street Address) (City) (County)
_____, regarding defendant's alleged discriminatory conduct.
(State) (Zip Code)

8. On _____,
(Day) (Month) (Year), Plaintiff filed charges
with the Equal Employment Opportunity Commission of the United States regarding defendant's alleged
discriminatory conduct.

9. The Equal Employment Opportunity Commission issued the attached Notice-of-Right-to-Sue
letter which was received by plaintiff on: 15, May, 2023.
(Day) (Month) (Year)

(NOTE: ATTACH NOTICE-OF-RIGHT-TO-SUE LETTER TO THIS COMPLAINT.)

10. The alleged discriminatory acts, in this suit, concern:

- A. ☐ Failure to employ plaintiff.
B. ☐ Termination of plaintiff's employment. Plaintiff was terminated from employment on
the following date: _____
C. ☐ Failure to promote plaintiff. Plaintiff was refused a promotion on the following date:

D. ☒ Other acts (please specify): Department of Labor hiring of family member
and friends resulted in Plaintiff's wrongful termination,
mistreatment, workplace bullying, harassment, and unfair
treatment. In violation of public policy.

11. The conduct of Defendant(s) was discriminatory because it was based on (check all that apply):

- A. ☐ Plaintiff's race
- B. ☐ Plaintiff's color
- C. ☐ Plaintiff's sex
- D. ☐ Plaintiff's religion
- E. ☐ Plaintiff's national origin
- F. ☐ Plaintiff's age
- G. ☐ Plaintiff's disability

12. A copy of the charges filed with the Department of Labor of the State of Delaware and/or the Equal Employment Opportunity Commission is attached to this complaint and is submitted as a brief statement of the facts of plaintiff's claim.

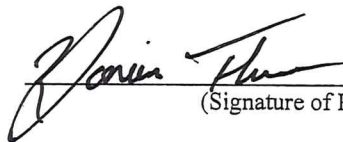
(NOTE: ATTACH A COPY OF THE CHARGES FILED WITH THE DEPARTMENT OF LABOR OF THE STATE OF DELAWARE AND/OR THE EQUAL EMPLOYMENT OPPORTUNITY COMMISSION OF THE UNITED STATES TO THIS COMPLAINT.)

THEREFORE, Plaintiff asks the Court to grant such relief as may be appropriate, including but not limited to (check all that apply):

- A. ☒ Injunctive relief (specify what you want the Court to order): Removal of Deputy Director Carolyn Nasse for violation of Public Policy as well as Racketeer Influence
- B. ☒ Back pay.
- C. ☒ Reinstatement to former position.
- D. ☒ Monetary damages in the amount of \$25,000,000.
- E. ☒ That the Court appoint legal counsel.
- F. ☒ Such relief as may be appropriate, including costs and attorney's fees.
- G. ☒ Other (specify): an official apology

I/We declare under penalty of perjury that the foregoing is true and correct.

Dated: August 09, 2023



(Signature of Plaintiff)

(Signature of additional Plaintiff)

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.